EnviroProjects, LLC

Technical Memorandum

Date: June 25, 2013

To: Eric Arohnson, Rialto Capital

From: Aaron M. Keel, EnviroProjects

Re: Aris T Allen Boulevard property, Wetlands and Waters Delineation Verification

EP#: 20130099

The following items summarize key points of the Aris T Allen Boulevard property, Wetlands and Waters Delineation Verification.

- On June 1, 2013, EnviroProjects conducted a stream and wetland verification study of the Aris T Allen Boulevard property. A wetland delineation of the subject property was conducted by Bowman Engineering in 2005. A copy of the previous 2005 Wetland Mapping is included in Figure 1.
- Currently the property owner is considering a large multi-family residential development at the site, and is not proposing to impact wetlands, streams or buffers, per the previous 2005 delineation.
- In 2010 the federal standards for wetland and Waters of the US delineation changed. Also more than 5 years have passed since the last wetland delineation study. The previous wetland delineation is no longer valid. EnviroProjects was tasked to verify if the previous wetland delineation accurately defines the limits of jurisdictional waters, including wetlands.
- The study area is a subset of the entire property, identified as the development envelope. The study area limits are defined on the attached Figure 1: Wetland Study Map and Figure 2, Study Area aerial Photograph.
- A wetland presence/absence determination was conducted according to the 1987 US Army Corps of Engineers Wetland Delineation Manual and the Atlantic and Gulf Coastal Plain Region Regional Supplement, 2010.
- Regional soils mapping of the study area indicates that some of the study site contains mapped "Partially Hydric" soil series. However, field investigation of the Study Area finds the only truly hydric soils at the study area occur within the bed and banks of the existing stream. Figure 3: Soils Map shows the mapped soil series at the study area.
- The National Wetlands Inventory (NWI) map (Figure 4) shows no mapped wetlands within the project study area.
- The project occurs within the headwaters of Church Creek, draining to the South River, Use Class I watershed. Hydrologic Unit Code (HUC) is 020600040302.
- The mapped stream within the study area is an ephemeral Waters of the US headwaters, matching the previous wetland delineation study. Nontidal

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wetlands were not found to be present within the study area.

 Two data forms were completed on the subject property in areas where new wetlands might be discovered. Neither data proved the existence of wetlands. The Upland Data Point A and B are shown on Figure 1 and datasheets are attached.

FINDINGS

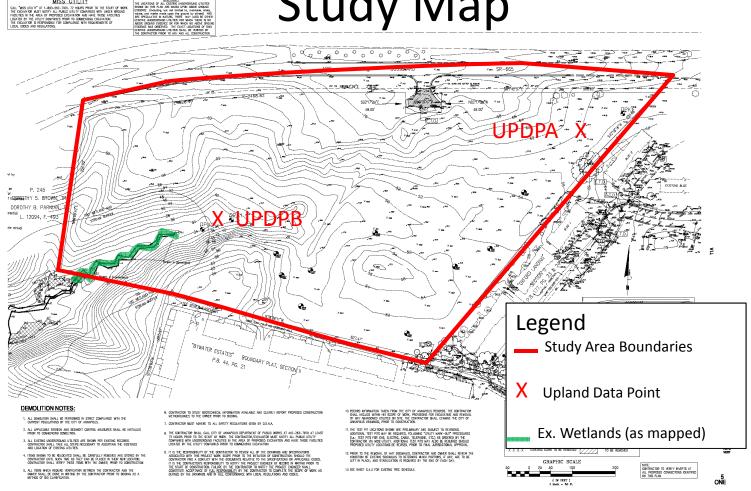
- On June 1, 2013, EnviroProjects conducted a wetland presence/absence inspection of the Aris T Allen Boulevard property is accordance with the principles of the 1987 US Army Corps of Engineers Wetland Delineation Manual and the Atlantic and Gulf Coastal Plain Region Regional Supplement to verify the accuracy of previous wetland delineation studies by others conducted in 2005. A formal and complete Wetland Delineation Study of the property was not conducted by EnviroProjects.
- The previous wetland delineation study was conducted in 2005 and is no longer valid. A new wetland study, using current standards, would be required to obtain State/Federal agency concurrence with the wetland delineation.
- The June 2013 EnviroProjects inspection finds that the existing waters/wetlands within the study area are accurately delineated. No new wetlands were observed within the project area.
- The current proposed development avoids impacts to wetlands and streams and the stream buffer. Thus, no further work to define jurisdictional waters of the US within the project area is required.
- However, if official State/Federal wetland boundary verification is required; and/or the project design changes and impacts streams or jurisdictional wetland/stream buffers; then a new complete wetland delineation study will be required.
- If a new wetland delineation study were conducted today, EnviroProjects does not expect the limits of jurisdictional waters, including wetlands, will change significantly.

If there are any questions or concerns please contact me at the below data or akeel@EnviroProj.com.

Aaron M. Keel EnviroProjects

Attachments: Figure 1: Wetland Mapping; Figure 2: Study Area Aerial Photograph; Figure 3: Soils Map; Figure 4: National Wetlands Inventory (NWI) Map; Upland Data Forms

Aris T Allen – Wetland Verification NISS JULIUX SI VICTOR CHANGE (IN THE CAPPER 1909 C) FOR CHANGE (IN THE



EnviroProjects, LLC

June 2013



Base map is a reproduction of the Google Earth, aerial photography, Not to Scale



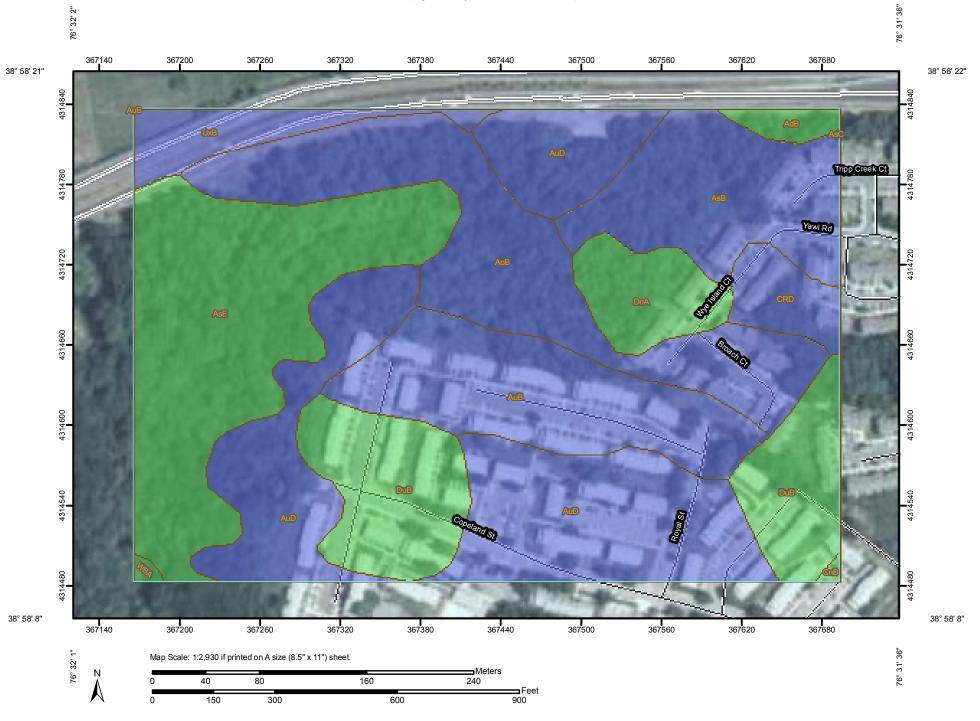
FIGURE 2 – Project Study Area Map, Aris T Allen Boulevard Property Aris T Allen Boulevard, City of Annapolis, Maryland

EnviroProjects, LLC

93 Eastway, Severna Park, MD 21146

www.EnviroProj.com

EP No.20130099



MAP LEGEND

Area of Interest (AOI) Area of Interest (AOI) Soils

Soil Map Units

Soil Ratings

All Hydric





Unknown Hydric

Not rated or not available

Political Features



Water Features

Streams and Canals

Transportation

+++ Rails

Interstate Highways

US Routes

Major Roads

Local Roads

 \sim

MAP INFORMATION

Map Scale: 1:2,930 if printed on A size (8.5" × 11") sheet.

The soil surveys that comprise your AOI were mapped at 1:12,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service Web Soil Survey URL: http://websoilsurvey.nrcs.usda.gov Coordinate System: UTM Zone 18N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Anne Arundel County, Maryland Survey Area Data: Version 10, Jan 27, 2011

Date(s) aerial images were photographed: 6/21/2005

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Hydric Rating by Map Unit

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
AdB	Adelphia-Holmdel complex, 2 to 5 percent slopes	Partially Hydric	0.4	0.9%
AoB	Annapolis loamy sand, 2 to 5 percent slopes	Not Hydric	6.9	15.1%
AsB	Annapolis fine sandy loam, 2 to 5 percent slopes	Not Hydric	4.4	9.4%
AsC	Annapolis fine sandy loam, 5 to 10 percent slopes	Not Hydric	0.0	0.0%
AsE	Annapolis fine sandy loam, 15 to 25 percent slopes	Partially Hydric	8.6	18.7%
AuB	Annapolis-Urban land complex, 0 to 5 percent slopes	Not Hydric	5.1	11.1%
AuD	Annapolis-Urban land complex, 5 to 15 percent slopes	Not Hydric	10.8	23.5%
CnB	Colemantown-Urban land complex, 0 to 5 percent slopes	Partially Hydric	0.1	0.1%
CRD	Collington and Annapolis soils, 10 to 15 percent slopes	Not Hydric	1.1	2.4%
DnA	Donlonton fine sandy loam, 0 to 2 percent slopes	Partially Hydric	1.7	3.8%
DuB	Donlonton-Urban land complex, 0 to 5 percent slopes	Partially Hydric	5.3	11.6%
UxB	Udorthents, loamy, sulfidic substratum, 0 to 5 percent slopes	Not Hydric	1.5	3.2%
WBA	Widewater and Issue soils, 0 to 2 percent slopes, frequently flooded	Partially Hydric	0.1	0.2%
Totals for Area of Interest			46.1	100.0%

Rating Options

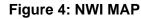
Aggregation Method: Absence/Presence

Tie-break Rule: Lower



U.S. Fish and Wildlife Service

National Wetlands Inventory



Jun 4, 2013

Wetlands

Freshwater Emergent

Freshwater Forested/Shrub

Estuarine and Marine Deepwater

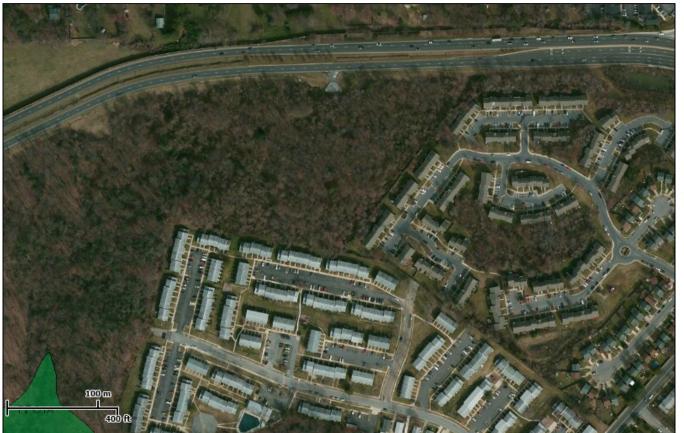
Estuarine and Marine

Freshwater Pond

Lake

Riverine

Other



This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on

User Remarks:

Aris T Allen Boulevard Proeprty

WETLAND DETERMINATION DATA FORM - Atlantic and Gulf Coastal Plain Region

EnviroProjects, LLC

Project/Site: Aris T. Allen		City/County: AA	Sampling Date: 06/01/13	
Applicant/Owner: Rialto Capital		State: MD	Sampling Point: UPDPA	
Investigator: EnviroProjects, LLC	Keel/Darcy, EP	Section, Township, Range: City of A	nnapolis	
	flat area in NE corner P-A Lat: del Complex	Local relief (concave, convex, none): Long: Sym: AdB NWI Classification:	Datum:	
Are climatic / hydrologic conditions on the si Are vegetation , Soil Are vegetation , Soil	te typical for this time of year? or Hydrology significantly or Hydrology naturally pro	Yes X No No disturbed? Are "Normal Circumstance	(If No, explain in Remarks.)	
SUMMARY OF FINDINGS - Attach site Hydrophytic Vegetation Present? Wetland Hydrology Present? Hydric Soils Present?	map showing sampling pointYesXNoYesNoNoYesNoNo	locations, transects and important features. Is this Sampling Point Will X X Yes No	thin a Wetland?	
Remarks: UPLAND DATA	POINT			
HYDROLOGY				
Wetland Hydrology Indicators:		Secondary Indicate	ors (minimum of two required)	
Primary Indicators (minimum of one is research Surface Water (A1) High Water Table (A2) Saturation (A3) Water Marks (B1) Sediment Deposits (B2) Drift Deposits (B3) Algal Mat or Crust (B4) Iron deposits (B5) Inundation Visible on Aerial Imagery	Water Stained Leaves Aquatic Fauna (B13) Marl Deposits (B15) (I Hydrogen Sulfide Odc Oxidized Rhizosphere Presence of Reduced Recent Iron Reduction Thin Muck Surface (C	Sparsely Ve	Cracks (B6) getated Concave Surface (B8) itterns (B10) Lines (B16) Water Table (C2) rrows (C8) /isible on Aerial Imagery (C9) c Position (D2)	
Field Observation				
Surface Water Present? Yes		Wetland Hydrology Prese	ent? Yes No_X	
Saturation Present? Yes(includes capillary fringe)	No X Depth (inches):			
Describe Recorded Data (stream gauge Water Table Not observed -	_	os, previous inspections), if available:		
Remarks: UPLAND DATA POINT	A			

Wetland E-Form ©

Project/Site: Aris T. Allen EnviroProjects, LLC SOIL Sampling Point: Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.) Depth Matrix Colors Redox Features (inches) (Color Moist) (Color Moist) Remarks Type¹ Texture 0-3 10YR 3/2 Surface and Organic layer 3-16 10YR 5/6 10YR5/8 uniform matrix ¹Type: C = Conecntration, D=Depletion, RM=Reduced Matrix CS= Covered or Coated Sand Grains ²Location: PL=Pore Lining, M=Matrix Indicators for Problematic Hydric Soils³: Hydric Soil Indicators Histosol (A1) Polyvalue Below Surface (S8) (LRR S, T, U) 1cm Muck (A9) (LRR O) Histic Epipedon (A2) Thin Dark Surface (S9) (LRR S, T, U) 2 cm Muck (A10) (LRR S) Black Histic (A3) Loamy Mucly Mineral (F1) (LRR O) Reduced Vertic (F18) (outside MLRA 150A,B) Hydrogen Sulfide (A4) Loamy Gleyed Matrix (F2) Piedmont Floodplain Soils (F19) (LRR P, S, T) Stratified layers Depleted Matrix (F3) Anomalous Bright Loamy Soils (F20) Organic Bodies (A6) (LRR P, T, U) Redox Dark Surface (F6) (MLRA 153B) 5 cm Mucky Mineral (A7) (LRR U) Depleted Dark Surface (F7) Red Parent Material (TF2) Muck Presence (A8) (LRR U) Redox Depressions (F8) Other (explain in Remarks) 1cm Muck (A9) (LRR P, T) Marl (F10) (LRR U) ³ Indicators of hydrophytic vegetation and Depleted Below Dark Surface (A11) Depleted Ochric (F11) (MLRA 151) Thick Dark Surface (A12) Iron-Manganese Masses (F12) (LRR O, P, T) wetland hydrology must be present. Coast Prairie Redox (A16) (MLRA 150A) Umbric Surface (F13) (LRR P, T, U) Sandy Mucky Mineral (S1) (LRR O, S) Delta Ochric (F17) (MLRA 151) Sandy Gleyed Matrix (S4) Reduced Vertic (F18) (MLRA 150A, 150B) Sandy Redox (S5) Piedmont Floodplain Soils (F19) (MLRA 149A) Stripped Matrix (S6) Anomalous Bright Loamy Soils (F20) (MLRA 149A, 153C, 153D) Dark Surface (S7) (LRR P,, S, T, U) Restrictive Layer (if observed): Yes No ____x Hydric Soil Present? Type: Depth (inches): Remarks: No Hydric Soil observed within within upper soil profile Photograph of Upland Data Point

Vegetation	Project/Site: Aris	T. Allen	EnviroProjects, LLC Sampling Point: UPDPA
Tree Stratum (Plot sizes:	Absolute % Cover 40%	Dominant Indica Species? Statu Y Fac	Number of Dominant Species
Red Maple			That are OBL, FACW, or FAC: 3 (A) Total Number of Dominant Species Across All Strata 4 (B)
4	<u> </u>		Species Across All Strata 4 (B) Percent of Dominant Species That Are OBL, FACW or FAC 75% (A/B)
5			Prevalence Index Worksheet
7			Total % Cover of Multiply by OBL species 0 x 1 = 0 FACW specie 0 x 2 = 0
Sapling Stratum (otal Cover: 40% _) 	Y Fac	FAC species $\begin{array}{cccccccccccccccccccccccccccccccccccc$
kea Maple			Column Tota 190 (A) 630 (B)
4			Prevalence Index = B/A = 3.316 Hydrophytic Vegetation Indicators:
5			Dominance Test is > 50%Prevalence Index is = 3.01</td
7			Problematic Hydrophytic Vegetation¹ (Explai
Shrub Stratum (1N/A			Remarks: (If observed, list morphological adaptations below).
3			Meets hydrophytic vegetation criterion, per Regional Supplem
5			
7			_ _
Herb Stratum (otal Cover: 0% _) 5%	N Fac	eu .
Virginia strawberry 2 Rosa multiflora Multiflore Rose	40%	Y Fact	J_
3 Smilax rotundifolia Greenbrier 4	15%	N Fact	<u>J </u>
5			_
7			
Woody Vine Stratu (otal Cover: 60% 	Y Fac	_
5	otal Cover: 70%		Hydrophytic Vegetation Present? Yes <u>X</u> No

WETLAND DETERMINATION DATA FORM - Atlantic and Gulf Coastal Plain Region

EnviroProjects, LLC

City/County: AA Sampling Date: 06/01/13
State: MD Sampling Point: UPDPB
Section, Township, Range: City of Annapolis
Local relief (concave, convex, none): CONCQVe
t locations, transects and important features, etc.
X
Secondary Indicators (minimum of two required)
Wetland Hydrology Indicators Surface Soil Cracks (B6) Sparsely Vegetated Concave Surface (B8) Drainage Patterns (B10) Moss Trim Lines (B16) Dry-Season Water Table (C2) Crayfish Burrows (C8) Saturation Visible on Aerial Imagery (C9) Cry norks) Wetland Hydrology Indicators Surface Soil Cracks (B6) Sparsely Vegetated Concave Surface (B8) Dry-Season Water Table (C2) Crayfish Burrows (C8) Saturation Visible on Aerial Imagery (C9) Shallow Aquitard FAC-Neutral Test (D5)
Wetland Hydrology Present? Yes No _ X
os, previous inspections), if available:
t s (logelling)

EP#

EnviroProjects, LLC SOIL Project/Site: Aris T. Allen Sampling Point: Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.) Redox Features Depth Matrix Colors (inches) (Color Moist) (Color Moist) Loc² Remarks Type¹ Texture 10YR 4/4 Uniform Bottomland Alluvium 0-16 10YR 4/6 85 ¹Type: C = Conecntration, D=Depletion, RM=Reduced Matrix CS= Covered or Coated Sand Grains ²Location: PL=Pore Lining, M=Matrix Indicators for Problematic Hydric Soils³: Hydric Soil Indicators Histosol (A1) Polyvalue Below Surface (S8) (LRR S, T, U) 1cm Muck (A9) (LRR O) Histic Epipedon (A2) Thin Dark Surface (S9) (LRR S, T, U) 2 cm Muck (A10) (LRR S) Black Histic (A3) Loamy Mucly Mineral (F1) (LRR O) Reduced Vertic (F18) (outside MLRA 150A,B) Hydrogen Sulfide (A4) Loamy Gleyed Matrix (F2) Piedmont Floodplain Soils (F19) (LRR P, S, T) Stratified layers Depleted Matrix (F3) Anomalous Bright Loamy Soils (F20) Organic Bodies (A6) (LRR P, T, U) Redox Dark Surface (F6) (MLRA 153B) 5 cm Mucky Mineral (A7) (LRR U) Depleted Dark Surface (F7) Red Parent Material (TF2) Muck Presence (A8) (LRR U) Redox Depressions (F8) Other (explain in Remarks) 1cm Muck (A9) (LRR P, T) Marl (F10) (LRR U) ³ Indicators of hydrophytic vegetation and Depleted Below Dark Surface (A11) Depleted Ochric (F11) (MLRA 151) Thick Dark Surface (A12) Iron-Manganese Masses (F12) (LRR O, P, T) wetland hydrology must be present. Coast Prairie Redox (A16) (MLRA 150A) Umbric Surface (F13) (LRR P, T, U) Sandy Mucky Mineral (S1) (LRR O, S) Delta Ochric (F17) (MLRA 151) Sandy Gleyed Matrix (S4) Reduced Vertic (F18) (MLRA 150A, 150B) Sandy Redox (S5) Piedmont Floodplain Soils (F19) (MLRA 149A) Stripped Matrix (S6) Anomalous Bright Loamy Soils (F20) (MLRA 149A, 153C, 153D) Dark Surface (S7) (LRR P,, S, T, U) Restrictive Layer (if observed): Hydric Soil Present? Yes No___ X Type: Depth (inches): Remarks: Photo of Upland Data Point

Vegetation	Project/Site: Aris	T. Allen		EnviroProjects, LLC	Sampling Point: UPDPB
-	Absolute	Dominant	Indicator	Dominance Test worksheet:	
Tree Stratum (Plot sizes:) % Cover	Species?	Status		
1 Acer Rubrum	5%	N	Fac	Number of Dominant Species	
Red Maple				That are OBL, FACW, or FAC:	2 (A)
2 Ilex Opaca	10%	Y	Fac		
American Holly				Total Number of Dominant	
3 Liriodendron tulipifera	10%	Y	FacU	Species Across All Strata	4(B)
Tulip Poplar (Yellow Poplar)					
4				Percent of Dominant Species	
				That Are OBL, FACW or FAC	50% (A/B)
5					
				Prevalence Index Worksheet	
6					
				Total % Cover of Multiply	by
7				OBL species 0 x 1 =	0
				FACW specie 3 x 2 =	6
	I Cover: 25%			FACUL Species 38 x 3 =	114
Sapling Stratum ()				FACU Specie 30 x 4 = UPL Species 0 x 5 =	
N/A				or L Species 0 x 5 =	
2	_			Column Tota 71 (A)	240 (B)
				Coldilli Tota 71 (A)	(D)
-					
3				Prevalence Index = B/A =	3.38
4				Hydrophytic Vegetation Indica	ators:
				Trydrophytic vegetation indica	nors.
	_			Dominance Test is	c > E00/
b					
				Prevalence Index	
6				Problematic Hydro	ophytic Vegetation ¹ (Explain)
					
7				1 Indicators of hydric soil and wetland	hydrology must be present
	10				
Shrub Stratum ()	Cover: 0%			Remarks: (If observed, list more	phological adaptations below).
	1.50		_	Remarks. (ii observed, list more	mological adaptations below).
1 Ligustrum sp.	15%	<u> </u>	Fac		NOT setisfied
Privet	<u> </u>			Hydrophytic vegetation paramete	ers NOT satistied
3	_				
4					
5					
6	_				
7					
	_				
Total Herb Stratum ()	I Cover: 15%				
·					
1 Impatiens Capensis	3%	N	FacW		
Spotted Touch-Me-Not			_		
2 Carex sp.		<u>N</u>	Fac		
sedge 3 Phytolacca americana	 5%	N	FacU		
American pokeweed					
4 Parthenocissus quinquefolia	15%	Y	FacU		
Virginia Creeper					
5					
6	_				
7					
	I Cover: 26%				
Woody Vine Stratu () 1 Hedera helix	5%	N	NI		
English Ivy			131		
2 Toxicodendron radicans	5%	<u>N</u>	Fac		
Poison Ivy	_				
3					
	<u>—</u>				
T				Hydrophytic	
5				Vegetation	
	_			Present? Yes	No <u>x</u>
Total	Cover: 10%				